

**Tujuana McGee**

---

**From:** Alex Russell <ralatney@gmail.com>  
**Sent:** Friday, March 24, 2023 1:24 PM  
**To:** Tujuana McGee  
**Cc:** Jasmine Brown  
**Subject:** Re: FW: Galloway Law Firm: Latney A. Russell v. Flixbus, Inc. - CVA# 1:23-cv-00796-MHC  
- Our File# 6420 -1 - Consolidated Joint Preliminary Report and Discovery Plan -  
FOLLOW-UP - PLEASE RETURN - DUE BY - Friday, March 24, 2023

\*\*\* External Sender - Please Exercise Caution\*\*\*

Hello,

I do not want to submit a joint report if you're not going to accept my suggestions.

Moving forward I will submit a separate report to the courts.

Regards,

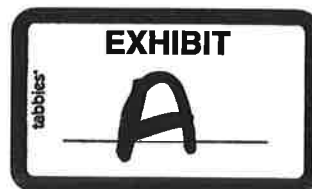
Latney Russell

On Fri, Mar 24, 2023 at 8:40 AM Tujuana McGee <[TMcgee@gallowaylawfirm.com](mailto:TMcgee@gallowaylawfirm.com)> wrote:

Mr. Russell,

As this is supposed to be a "consolidated" report, meaning that it is agreed upon by both Plaintiff and Defendant, Defendant objects to the addition of this inflammatory language. With that being said, I have may edits to the first paragraph for your review.

Best,



Tujuana S. McGee

**Tujuana S. McGee, Director**

990 Hammond Drive, Suite 210

Atlanta, GA 30328

O: 678-951-1500 | F: 678-951-1510

[TMcgee@gallowaylawfirm.com](mailto:TMcgee@gallowaylawfirm.com)

2510 14th Street, Suite 910, Gulfport, Mississippi 39501



Galloway Johnson Tompkins Burr & Smith

TX | LA | MS | AL | FL | GA | MO

[www.gallowaylawfirm.com](http://www.gallowaylawfirm.com)

THIS MAY CONTAIN CONFIDENTIAL ATTORNEY-CLIENT  
OR PRIVILEGED COMMUNICATIONS. PLEASE DO NOT  
FORWARD WITHOUT SPECIFIC PERMISSION.

**From:** Alex Russell <[ralatney@gmail.com](mailto:ralatney@gmail.com)>

**Sent:** Friday, March 24, 2023 11:23 AM

**To:** Jasmine Brown <[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)>

**Cc:** Tujuana McGee <[TMcgee@gallowaylawfirm.com](mailto:TMcgee@gallowaylawfirm.com)>

**Subject:** Re: FW: Galloway Law Firm: Latney A. Russell v. Flixbus, Inc. - CVA# 1:23-cv-00796-MHC - Our File# 6420 -1 - Consolidated Joint Preliminary Report and Discovery Plan -FOLLOW-UP - PLEASE RETURN - DUE BY - Friday, March 24, 2023

\*\*\* External Sender - Please Exercise Caution\*\*\*

Hello,

Please view the attached file below!

Regards,

Latney Russell

On Thu, Mar 23, 2023 at 1:40 PM Jasmine Brown <[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)> wrote:

Ok, please be sure to reply all or copy in the attorney Ms. McGee, Esq. I have re-included her into this correspondence, so she can respond if needed.

As discussed, we would like to ensure this report is filed in a timely manner with the court. **Please provide the report back to us no later than 1:00PM ET/ 10:00AM MT, so we can discuss any revisions needed, prior to filing. If not the report is not provided back to back to us by 1:00PM ET tomorrow,** we will be filing the document, as is.

If any questions, please let us know!

Thank You,

**Jasmine P. Brown, Paralegal**  
990 Hammond Drive, Suite 210  
Atlanta, GA 30328  
O: 678-951-1500 | F: 678-951-1510  
[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)

**GALLOWAY**

Galloway Johnson Tompkins Burr & Smith

TX | LA | MS | AL | FL | GA | MO  
[www.gallowaylawfirm.com](http://www.gallowaylawfirm.com)

THIS MAY CONTAIN CONFIDENTIAL ATTORNEY-CLIENT  
OR PRIVILEGED COMMUNICATIONS. PLEASE DO NOT  
FORWARD WITHOUT SPECIFIC PERMISSION.

**From:** Alex Russell <[ralatney@gmail.com](mailto:ralatney@gmail.com)>

**Sent:** Thursday, March 23, 2023 4:32 PM

**To:** Jasmine Brown <[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)>

**Subject:** Re: FW: Galloway Law Firm: Latney A. Russell v. Flixbus, Inc. - CVA# 1:23-cv-00796-MHC - Our File# 6420 -1 - Consolidated Joint Preliminary Report and Discovery Plan -FOLLOW-UP - PLEASE RETURN - DUE BY - Friday, March 24, 2023

\*\*\* External Sender - Please Exercise Caution\*\*\*

Hello,  
It will be ready tomorrow.

Regards,

Alex Russell

On Thu, Mar 23, 2023 at 6:01 AM Jasmine Brown <[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)> wrote:

Good Morning Mr. Russell,

We are following up on any suggested edits you might have and/or your approval for our office to file the, **Consolidated Joint Preliminary Report and Discovery Plan?**

**The joint report is due tomorrow, Friday, March 24<sup>th</sup>**, and we prefer to have it back today, so we can ensure it is filed in a timely manner. **Please advise if we have your permission to file?**

If you have any questions, please email us or call **(678) 951-1500**, and reference file number, **6420-1**.

Thank You,

**Jasmine P. Brown, Paralegal**  
990 Hammond Drive, Suite 210  
Atlanta, GA 30328  
O: 678-951-1500 | F: 678-951-1510  
[JBrown@gallowaylawfirm.com](mailto:JBrown@gallowaylawfirm.com)

**GALLOWAY**

Galloway Johnson Tompkins Burr & Smith

TX | LA | MS | AL | FL | GA | MO  
[www.gallowaylawfirm.com](http://www.gallowaylawfirm.com)

THIS MAY CONTAIN CONFIDENTIAL ATTORNEY-CLIENT  
OR PRIVILEGED COMMUNICATIONS. PLEASE DO NOT  
FORWARD WITHOUT SPECIFIC PERMISSION.

**From:** Jasmine Brown

**Sent:** Friday, March 17, 2023 2:52 PM

**To:** Alex Russell <[ralatney@gmail.com](mailto:ralatney@gmail.com)>

**Cc:** Tujuana McGee <[TMcgee@gallowaylawfirm.com](mailto:TMcgee@gallowaylawfirm.com)>

**Subject:** Galloway Law Firm: Latney A. Russell v. Flixbus, Inc. - CVA# 1:23-cv-00796-MHC - Our File# 6420 -1 - Consolidated Joint Preliminary Report and Discovery Plan - PLEASE RETURN - DUE BY - Friday, March 24, 2023

Good Afternoon Mr. Russell,

Please see the attached correspondence regarding, **Latney A. Russell v. Flixbus, Inc.**

- **Consolidated Joint Preliminary Report and Discovery Plan**

The Consolidated Joint Preliminary Report and Discovery Plan, must be filed with the court by Friday, March 24<sup>th</sup>, 2023. **Please review thoroughly and advise any changes, so Ms. McGee, Esq. can respond? If no changes are needed, then please confirm this can be filed by our office.** I will follow-up closer to the deadline if no response, as we would prefer to have any changes made by, **Thursday, March 23<sup>rd</sup>**.

To ensure you receive a timely response, please include attorney Ms. McGee, Esq. and myself in your correspondence. Let us know if any questions!

Thank You,